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Attorneys for Plaintiff/Counter-Defendant

CornerStone Staffing Solutions, Inc. and

Counter-Defendant Mary Anderson

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CORNERSTONE STAFFING
SOLUTIONS, INC., a California
corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES, an
individual; *et al.*,

Defendants.

AND RELATED COUNTER-
CLAIMS

CASE NO. C12-01527 RS

**STIPULATION FOR DISMISSAL
WITH PREJUDICE; ~~[PROPOSED]~~
ORDER**

1 Plaintiff/Counter-Defendant CORNERSTONE STAFFING SOLUTIONS,
2 INC. (“CornerStone”) and Defendants/Counter-Claimants LARRY THAXTER
3 JAMES, DEPLOY HR, INC., HANBON-MI II, INC., and HANBON-CT I, LLC
4 (“Counterclaimants”), by and through their counsel of record, hereby stipulate as
5 follows:

6 (1) In order to avoid the uncertainty associated with protracted litigation,
7 the expense associated therewith, and in order to settle their differences,
8 CornerStone and Counterclaimants have agreed to a settlement with each other.

9 (2) CornerStone agrees to dismiss the entire complaint with prejudice,
10 except for its claims against Defendant Larry James, which are the subject of a
11 separate stipulation and judgment being filed concurrently herewith. The
12 defendants dismissed with prejudice are David R. Batton, Andre Douzdzian,
13 Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc.,
14 Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I,
15 LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc.,
16 Deploy HR, Inc.

17 (3) Counterclaimants agree to dismiss all counterclaims in their entirety
18 with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and
19 Mary Anderson.

20 (4) The recovery of fees and costs is being addressed in separate
21 settlement documents.

22 **IT IS SO STIPULATED.**

HILL, FARRER & BURRILL LLP
A LIMITED LIABILITY PARTNERSHIP
ATTORNEYS AT LAW
ONE CALIFORNIA PLAZA, 37TH FLOOR
300 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3147

1 DATED: August 21, 2015

HILL, FARRER & BURRILL LLP

2
3 By: /s/ Clayton Hix

4 CLAYTON J. HIX
5 Attorneys for Plaintiff/Counter-
6 Defendant CORNERSTONE
STAFFING SOLUTIONS, INC.; and
Counter-Defendant MARY
ANDERSON

7 DATED: August 21, 2015

SCHEPER, KIM & HARRIS, LLP

8
9 By: /s/ David Scheper

10 DAVID SCHEPER
11 Attorneys for Defendant/Counter-
12 Claimant LARRY JAMES and
13 Defendants DEPLOY HR, INC.;
14 DEPLOYHR, INC.; HANBON MI I,
LLC; HANBON MI II, INC.; TEC
GROUP, INC.; HANBON-CARO,
LLC; HANBON-MARLETTE, LLC;
HANBON-PA I LLC

15 DATED: August 21, 2015

MORISON & PROUGH, LLP

16
17 By: /s/ William Morison

18 WILLIAM C. MORISON
19 Attorneys for Defendant/
20 Counterclaimant HANBON-CT I,
LLC

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation of the Parties, the Court orders as follows:

(1) The entire complaint is dismissed with prejudice, except for CornerStone's claims against Defendant Larry James, which are the subject of a separate stipulation and judgment. Specifically, the following defendants are dismissed with prejudice: David R. Batton, Andre Douzjdjian, Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc., Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I, LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc., and Deploy HR, Inc.

(2) All counterclaims are dismissed with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and Mary Anderson.

IT IS SO ORDERED.

Date: 8/21/15


 HON. RICHARD SEEBORG
 U.S. DIST. COURT JUDGE

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